

Ashley M. Gjøvik, JD
In Propria Persona
(415) 964-6272
ashleymgjavik@protonmail.com
Boston, MA

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

IN RE:

ESTATE OF
ASHLEY M. GJOVIK,

CHAPTER 7 CASE No: 25-11496

A.P. No. 25-01104

JUDGE CHRISTOPHER J. PANOS

**DEBTOR'S MOTION FOR A
PROTECTIVE ORDER & TO
COMPEL TRUSTEE ACTION**

PRIVATE TRUSTEE:
MARK DEGIACOMO, ESQ.

PROOF OF SERVICE

FED. R. BANKR. P. RULE 9013

CERTIFICATE & PROOF OF SERVICE

1. My name is Ashley Marie Gjovik. I am a self-represented Debtor in this above captioned matter. This is a Certificate and Proof of Service in **Debtor's Motion For A Protective Order & To Compel Trustee Action.**

2. I hereby certify that a true and correct copy of this Motion with Declaration and Exhibits was filed to the Bankruptcy Court's electronic filing system via email to the Pro Clerk on August 28 2025. There was a typo in the first version of the Declaration, and a second corrected one was promptly provided to replace or supplement the first version.

3. I hereby certify that a true and correct copy of this Motion with Declaration and Exhibits was served upon Trustee Mark G. DeGiacomo via email (mdegiacono@harrisbeachmurtha.com and jbabula@harrisbeachmurtha.com).

4. I hereby certify that Apple and the U.S Court are noticed via posting a copy of this Motion with Declaration and Exhibits to the federal docket for *Gjovik v. Apple Inc*, 3:23-cv-04597-EMC (N.D. Cal.) on August 28 2025 at Dkt. 251.


5. I hereby certify that Debtor's July 23 2025 Consumer Financial Protection Bureau whistleblower tip was provided a true and correct copy of this Motion with Declaration and Exhibits via email on August 28 2025.

6. I hereby certify that true and correct copies of proofs of the above service are attached as exhibits.

7. I declare under penalty of perjury under the laws of the United States of America, and in compliance with Fed.R.Bankr.P. Rule 9011, that the foregoing is true and correct.

Executed on August 28 2025 in Boston, Massachusetts.

Respectfully submitted,



/s/ Ashley M. Gjovik

In Propria Persona

18 Worcester Square, Apt 1

Boston, MA 02118

Dated: August 28 2025

EXHIBITS

Service in Bankruptcy Case 25-11496: Debtor's Motion For A Protective Order & To Compel Trustee Action

From Ashley Gjovik <ashleymgjovik@protonmail.com>
To Jennifer Babula <jbabula@harrisbeachmurtha.com>, Mark G. DeGiacomo <mdegiacomo@harrisbeachmurtha.com>
Date Thursday, August 28th, 2025 at 1:42 PM

Hello,

Today, August 28 2025, I efiled a Motion requesting a Protective Order and to Compel Trustee Action in Chapter 7 Bankruptcy case 25-11496.

Due to local rules, I'm unable to file directly on PACER and instead have emailed the Pro Se Clerk and they will post it at some point.

I'm also serving you notice via email with the Motion, Declaration, Exhibits, and confirmation of efilings attached.

I'm also serving you a copy of my August 27 2025 filing in my Northern District of California litigation (*Gjovik v Apple*, 3:23-cv-04597) which is posted to Dkt. 250.

-Ashley

Ashley M. Gjovik
BS, JD, PMP

Sent with [Proton Mail](#) secure email.

7.49 MB 12 files attached

- In Re Gjovik Motion to Compel Trustee Declaration CORRECTED.pdf 90.25 KB
- EFILING 20250828.pdf 165.17 KB
- Exhibit D CFPB Tip 20250723.pdf 186.44 KB
- Exhibit B Email with Trustee re 341 Meeting.pdf 235.67 KB
- Exhibit A Emails about Apple Card Trustee.pdf 259.64 KB
- In Re Gjovik Trustee Motion to Compel Trustee 20250828.pdf 295.81 KB
- Exhibit F 20250825 Apple Trustee Debtor Emails.pdf 535.34 KB
- Exhibit G 20250825 Apple CAND Filings.pdf 714.46 KB
- Exhibit E Trustee Debtor.pdf 754.86 KB
- Exhibit H Dkt 250 Opposition to Motion to Stay.pdf 1.06 MB
- Exhibit C CFPB 2024.pdf 2.27 MB
- Dkt 250 Plaintiff's Opposition to Apple's Emergency Motion to Stay.pdf 1023.28 KB

Pro Se filing in Bankruptcy Case 25-11496: Debtor's Motion For A Protective Order & To Compel Trustee Action

From Ashley Gjovik <ashleymgjovik@protonmail.com>
To MABdb_Prose_Filings<prose_filings@mab.uscourts.gov>
Date Thursday, August 28th, 2025 at 1:23 PM

Hello,

I am the Debtor in Bankruptcy Case 25-11496 and I am filing a Motion.

Per local rules, I am efilng by emailing the Pro Se Clerk. Please note - because these are concurrently filed with filings in a civil case in the Northern District of California (*Gjovik v Apple*, 3:23-cv-04597), I will be immediately efilng on PACER copies of this email as proof of filing along with the attached documents.

Filing: Debtor's Motion For A Protective Order & To Compel Trustee Action

Supporting declaration and exhibits (A-H) are attached.

-Ashley

—
Ashley M. Gjovik
BS, JD, PMP

6.32 MB 10 files attached

- In Re Gjovik Motion to Compel Trustee Declaration.pdf 87.64 KB
- Exhibit D CFPB Tip 20250723.pdf 186.44 KB
- Exhibit A Emails about Apple Card Trustee.pdf 259.64 KB
- Exhibit B Email with Trustee re 341 Meeting.pdf 235.67 KB
- In Re Gjovik Trustee Motion to Compel Trustee v4.pdf 295.81 KB
- Exhibit G 20250825 Apple CAND Filings.pdf 714.46 KB
- Exhibit F 20250825 Apple Trustee Debtor Emails.pdf 535.34 KB
- Exhibit E Trustee Debtor.pdf 754.86 KB
- Exhibit H Dkt 250 Opposition to Motion to Stay.pdf 1.06 MB
- Exhibit C CFPB 2024.pdf 2.27 MB

Re: Pro Se filing in Bankruptcy Case 25-11496: Debtor's Motion For A Protective Order & To Compel Trustee Action

From Ashley Gjovik <ashleymgjovik@protonmail.com>
To MABdb_Prose_Filings<prose_filings@mab.uscourts.gov>
Date Thursday, August 28th, 2025 at 1:29 PM

Hello,

I apologize, the prior attached Declaration was incorrectly noted as in support of a concurrently filed Motion to Show Cause. I'm attaching a Corrected version for this motion, now instead noting this is in support of the Protective Order/Motion to Compel.

Please replace the prior version, or add this one in addition.

Thank you.

-Ashley

—
Ashley M. Gjovik
BS, JD, PMP

Sent with [Proton Mail](#) secure email.

On Thursday, August 28th, 2025 at 1:23 PM, Ashley M. Gjovik <ashleymgjovik@protonmail.com> wrote:

Hello,

I am the Debtor in Bankruptcy Case 25-11496 and I am filing a Motion.

Per local rules, I am efilng by emailing the Pro Se Clerk. Please note - because these are concurrently filed with filings in a civil case in the Northern District of California (*Gjovik v Apple*, 3:23-cv-04597), I will be immediately efilng on PACER copies of this email as proof of filing along with the attached documents.

Filing: Debtor's Motion For A Protective Order & To Compel Trustee Action

Supporting declaration and exhibits (A-H) are attached.

-Ashley

—
Ashley M. Gjovik
BS, JD, PMP

90.25 KB 1 file attached

In Re Gjovik Motion to Compel Trustee Declaration CORRECTED.pdf 90.25 KB

Activity in Case 3:23-cv-04597-EMC Gjovik v. Apple Inc. Notice (Other)

From ECF-CAND@cand.uscourts.gov <ECF-CAND@cand.uscourts.gov>
To efiling@cand.uscourts.gov
Date Thursday, August 28th, 2025 at 1:50 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

California Northern District

Notice of Electronic Filing

The following transaction was entered on 8/28/2025 at 10:50 AM and filed on 8/28/2025

Case Name: Gjovik v. Apple Inc.
Case Number: [3:23-cv-04597-EMC](#)
Filer: Ashley M Gjovik
Document Number: [251](#)

Docket Text:

NOTICE by Ashley M Gjovik re [250] Opposition/Response to Motion, *Plaintiff/Debtor's Motion For A Protective Order & To Compel Trustee Action* (Attachments: # (1) Declaration, # (2) Certificate/Proof of Service, # (3) Exhibit, # (4) Exhibit, # (5) Exhibit, # (6) Exhibit, # (7) Exhibit, # (8) Exhibit, # (9) Exhibit, # (10) Exhibit)(Gjovik, Ashley) (Filed on 8/28/2025)

3:23-cv-04597-EMC Notice has been electronically mailed to:

Ashley M Gjovik ashleymgjovik@protonmail.com
Jessica Perry jperry@orrick.com, tmcbride@orrick.com
Kathryn Grzenczyk Mantoan kmantoan@orrick.com, vmorse@orrick.com
Melinda S. Riechert mriechert@orrick.com, jromero@orrick.com
Ryan Booms rbooms@orrick.com

3:23-cv-04597-EMC Please see [Local Rule 5-5](#); Notice has NOT been electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\In Re Gjovik Trustee Motion to Compel Trustee 20250828.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-0]
[6b098708399fb1684ff78d9f7a3bdba10cbea4bb1c4abbb35626eb3772de0babb953]

3b88aa454617354081368a2e31754d8379155f241a240ccc28e735565bd0]]

Document description:Declaration

Original filename:C:\fakepath\In Re Gjovik Motion to Compel Trustee Declaration.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-1]
[0b1ddbd6c3821af6926719898cfb109105ff0f2c818891db1643a032f844eb6d1cf4
de2b7dfcf45d73081a89276553cd39a74c0952630e7dcb5fe90744d19ab1]]

Document description:Certificate/Proof of Service

Original filename:C:\fakepath\In Re Gjovik Motion to Compel Trustee Efiling and Service.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-2]
[4f5eec7ea4b3687c67bdfbf28427f6bada5347fd879d069d86f3d9d3b3b916d973c
815f58641a0a4de60f52088a61409f02fa39ea1647ae22ef5db7b60d73f5]]

Document description:Exhibit

Original filename:C:\fakepath\Exhibit A Emails about Apple Card Trustee.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-3]
[8d4409f3b08297c90bd6e7d9ec2cb4b736a0971c0e2fe302b81fb8d35e9b84a67bfc
f86d592a576de8a5e715059dfd34dde1048166fa56139ab13881e539cc26]]

Document description:Exhibit

Original filename:C:\fakepath\Exhibit B Email with Trustee re 341 Meeting.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-4]
[b16eee65b0dd40f78bbef384eeaf5a18503a84af7d224ce5a6a15d9929e1e4560e89
b0a59fa12c34f08e557113582c22e843ff0aa936b91c3c61b7dd1e46e390]]

Document description:Exhibit

Original filename:C:\fakepath\Exhibit C CFPB 2024.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-5]
[23edb8b6549499eda613d7c62f67fddba5f66e167c98bbe0e59fcff06a43e950ad4a
4c116de83bf5ca06f5a02c4c7de17eab7c7ffea42ff5b5d5f420781f11cd]]

Document description:Exhibit

Original filename:C:\fakepath\Exhibit D CFPB Tip 20250723.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-6]
[76df8302e7c74fd30a1c6906de993bacacfe6d38056bc48c4dd8504bff2a77573318
a6c283d9307e051819b44c92fcbce503ed4743066f81576a6950b605aa3f]]

Document description:Exhibit

Original filename:C:\fakepath\Exhibit E Trustee Debtor.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-7]
[22ce81bfb093cb55034d071f0cc5e9f1222bb972c772291cab523e1a144e40587b62
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Document description:Exhibit

Original filename:C:\fakepath\Exhibit F 20250825 Apple Trustee Debtor Emails.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-8]
[abc4cae41c9a23d387a744ff4d74386b08fefb584a9957f861b7b32e2a98f1b40ea3
b94988cc061a7db925cef163f7848609bd339c0e518029914dbdd8e8dfe1]]

Document description:Exhibit

Original filename:C:\fakepath\Exhibit G 20250825 Apple CAND Filings.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-9]
[21808b20b614294ee25bc84f7eb960872528da0f911db61f72e3bd40ccfa6c34b3a6

0f3dd559f36f5df85a96d9f349626a4e971275aae21a3fecfd14f9235701]]

Document description:Exhibit

Original filename:C:\fakepath\Exhibit H Dkt 250 Opposition to Motion to Stay.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/28/2025] [FileNumber=22736002-10
] [2822047a8bc4f1bb9ddfc93f7980def7438ef592525a5b46cbb0dbc018431fc0cf6
41fa05b5aa418dc70944877d1e34dccb88ccc44be42c1d78d48c2dfcaa845]]

Re: CFPB Whistleblower Tip: Possible Fraudulent Statements Made by Apple & Goldman Sachs re: Apple Card Enforcement Action

From Ashley Gjovik <ashleymgjovik@protonmail.com>

To whistleblower@cfpb.gov

Date Thursday, August 28th, 2025 at 3:23 PM

Update to July 23, 2025 Whistleblower Tip - Additional Evidence of Apple Card Pre-Launch Employee Program and Related Misconduct

Dear CFPB Enforcement Staff,

This follows my earlier email today updating my July 23, 2025 whistleblower tip regarding Apple's pre-launch Apple Card employee program violations.

I am attaching my concurrently filed Motion to Compel Trustee Action, which documents Apple Inc.'s attempts to use bankruptcy procedures in an apparent attempt to avoid accountability for Apple Card regulatory compliance violations, among other improper purposes. The motion describes how Apple sought to gain control over litigation involving the disputed Apple Card debt by obtaining an informal agreement from my bankruptcy trustee within 27 minutes while he was on vacation; using this unauthorized communication as basis for federal court filings, despite the Trustee's preexisting knowledge about this potential legal claim and the prior CFPB enforcement action.

The trustee was aware of both the Apple Card dispute and the pending CFPB enforcement matters when he agreed to Apple's request, and the motion and exhibits documents these communications and timeline.

I am providing this information for your records as it relates to the disputed Apple Card debt that was the subject of my original whistleblower tip.

Respectfully,

Ashley M. Gjovik

ashleymgjovik@protonmail.com

(415) 964-6272

—
Ashley M. Gjovik

BS, JD, PMP

Sent with [Proton Mail](#) secure email.

On Thursday, August 28th, 2025 at 3:13 PM, Ashley M. Gjovik <ashleymgjovik@protonmail.com> wrote:

Update to July 23, 2025 Whistleblower Tip - Additional Evidence of Apple Card Pre-Launch Employee Program and Related Misconduct

Dear CFPB Enforcement Staff,

CFPB Whistle Blower - AutoReply

From CFPB_WHISTLEBLOWER <CFPB_WHISTLEBLOWER@cfpb.gov>

To Ashley Gjovik <ashleymgjovik@protonmail.com>

Date Thursday, August 28th, 2025 at 3:24 PM

Thank you for contacting CFPB. The information you provided may help inform CFPB's priorities and investigations.

Please be aware that we cannot take in privileged information, which is any information that you obtained through your role as an attorney for the company you are reporting.

If you contacted CFPB for assistance resolving an issue that affected you personally, please submit your complaint to our Consumer Response team at (855) 411-CFPB (2372) or <http://www.consumerfinance.gov/complaint/>.

If you perform work related to a bank or other consumer financial service provider and you report or object to a possible violation of consumer financial protection laws, you may be protected from employment retaliation. You have 180 days from the date of retaliation to submit a complaint to the Department of Labor. For further details, visit http://www.whistleblowers.gov/acts/dfa_1057.html.

Regards,

Consumer Financial Protection Bureau